

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANICE STEVENSON,)
)
Plaintiff,)
)
V.) CIVIL ACTION NO. 05-CV-11584-DPW
)
NEIGHBORHOOD HOUSE CHARTER)
SCHOOL,)
)
Defendant.)
)

**DEFENDANT’S ASSENTED-TO MOTION FOR EXTENSION OF TIME
IN WHICH TO RESPOND TO AMENDED COMPLAINT**

Defendant Neighborhood House Charter School (“Defendant” or the “School”) hereby moves for an extension of time in which it may answer, move, or otherwise respond to Plaintiff’s Amended Complaint in the above-captioned action through and including October 7, 2005. As grounds for this motion, Defendant states as follows:

1. Plaintiff filed her Complaint on or about July 28, 2005.
2. On or about August 8, 2005, the Defendant's former counsel agreed to accept service of process on behalf of the School, and Plaintiff's counsel agreed to an extension of time in which Defendant could respond to the Complaint. On the same day, Plaintiff filed her Amended Complaint.
3. The requested extension will allow Defendant to investigate Plaintiff's allegations and more fully respond to the Amended Complaint.
4. The requested extension would cause Defendant's responsive pleading or motion to be due on or before Friday, October 7, 2005.
5. Plaintiff's counsel assents to this motion.

WHEREFORE, Defendant Neighborhood House Charter School respectfully requests that this Court grant an extension of time through and including October 7, 2005 for Defendant to answer, move, or otherwise respond to the Amended Complaint in this matter.

Respectfully submitted,
NEIGHBORHOOD HOUSE CHARTER
SCHOOL
By its attorneys,

/s/ Barry J. Miller

Lynn A. Kappelman (BBO # 642017)
Barry J. Miller (BBO # 661596)
SEYFARTH SHAW LLP
World Trade Center East
Two Seaport Lane, Suite 300
Boston, MA 02210-2028
Telephone: (617) 946-4800
Telecopier: (617) 946-4801

DATED: September 2, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served on John W. Davis, Davis & Davis, P.C., 77 Franklin Street, 3rd Floor, Boston, MA 02110, as counsel for the plaintiff by first class mail, postage prepaid, on September 2, 2005.

/s/ Barry J. Miller

Barry J. Miller